

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Federal-State Joint Board on) CC Docket No. 96-45
Universal Service)

**COMMENTS OF U S WEST, INC. TO PETITIONS
FOR RECONSIDERATION AND/OR CLARIFICATION**

I. INTRODUCTION

U S WEST, Inc. ("U S WEST") submits its comments on certain of the petitions for reconsideration and/or clarification of the Federal Communications Commission's ("Commission") Report and Order¹ which established support mechanisms to ensure the delivery of affordable telecommunications service to all Americans. While numerous parties filed petitions, U S WEST restricts its comments herein to those filed by MCI Telecommunications Corporation ("MCI")² and by several state utility commissions.³

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¹ In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, 7 Comm. Reg. (P&F) 109 (1997) ("Universal Service Order" or "Order"); Errata, rel. June 4, 1997; Order on Reconsideration, FCC 97-246, rel. July 10, 1997; consolidated appeals pending sub nom., Texas Office of Public Utility Counsel, 97-60421 (5th Cir.)

² MCI's Petition for Reconsideration and Clarification ("MCI Petition") filed July 17, 1997.

³ Petition for Reconsideration and Request for Clarification filed by Alaska Public Utilities Commission on July 15, 1997; Petition for Reconsideration by the Arkansas Public Service Commission filed July 17, 1997; Petition for Reconsideration by the Public Utility Commission of Texas filed June 26, 1997; Petition for Clarification of the Vermont Public Service Board and the Vermont

II. U S WEST FULLY SUPPORTS THE RECOMMENDATIONS OF PARTIES WHICH FILED IN SUPPORT OF A NATIONAL UNIVERSAL SERVICE FUND

The Commission should reconsider its decision to fund only 25 percent of the high-cost support necessary to maintain affordable rates in high-cost rural areas. Most of the state commissions which filed for reconsideration of the Order make compelling arguments urging the Commission to reconsider its decision. State commissions from Arkansas, Texas, Wyoming, Alaska, and Vermont clearly understand the enormous impacts a split fund will have on consumers in high-cost states. The Vermont Public Service Board and the Vermont Department of Public Service argue persuasively that the Act requires the Commission, not the states, to ensure that the fund is sufficient and that rural and urban rates are reasonably comparable.⁴ Vermont also argues that the decision to fund only 25 percent of the need is not supported in the record, does not have a reasonable basis, and is not based on the Joint Board's decision⁵ and that the primary purpose of the fund is to support costs allocated over the 25 percent factor.⁶

The Commission's USF Order does not acknowledge that the Fund has always, and must still, support some costs from the intrastate jurisdiction in order to keep rates affordable nationwide. Under the existing high cost support mechanism, the Commission authorized carriers to shift costs to the interstate jurisdiction to reduce their

Department of Public Service ("Vermont Petition") filed July 17, 1997; and Petition for Reconsideration by the Wyoming Public Service Commission ("Wyoming Petition") filed July 16, 1997.

⁴ Vermont Petition at 2-4.

⁵ Id. at 4.

⁶ Id.

intrastate revenue requirement, and the federal High Cost Fund paid for those additional intrastate costs. By funding only 25% of loop costs from the new Universal Service Fund, the Commission would reduce support for high costs carriers from existing levels. It would be overturning the old system, without any finding that the new system would meet the continuing goal of keeping rates affordable, as well as the new goals, such as keeping rates reasonably comparable.⁷

The Wyoming Public Service Commission argument removes the issue from jurisdictional authority concerns and demonstrates the impact on the consumer.

Wyoming argues, “With fewer than 300,000 access lines in Wyoming, it is unthinkable to expect that the full amount of this support will be borne by an intrastate universal service fund without having a debilitating impact on local rates.”⁸

It is likely that the national versus separated fund issue will be argued in the courts regardless of the Commission’s decision on this matter. The Commission should look at the persuasive arguments for a national fund on the record to date, the spirit and intent of the Act, and, most importantly, what is in the best interests of consumers and should reconsider its intention to implement a separated fund. The Commission should adopt a national universal service fund for rural and high-cost support.

⁷ Id. at 5 (footnote omitted).

⁸ Wyoming Petition at 3.

III. **THE COMMISSION MUST REJECT MCI'S PROPOSAL TO CLARIFY THAT STATES CANNOT INCLUDE CARRIERS' INTERSTATE AND INTERNATIONAL REVENUES IN DETERMINING ASSESSMENTS FOR STATE FUNDS**

In its Petition for Reconsideration and Clarification, MCI states that the Commission must “clarify that states cannot include carriers’ interstate and international revenues in determining assessments for state funds.”⁹ The Commission must reject this proposal for both legal and logical reasons. First, the Communications Act of 1934, as amended (the “Act”) clearly states:

Every telecommunications carrier that provides intrastate telecommunications services shall contribute, on an equitable and nondiscriminatory basis, in a manner determined by the State to the preservation and advancement of universal service in that State.¹⁰

Pursuant to the Act, the state determines the manner in which intrastate telecommunications carriers are assessed. States certainly have the authority to decide to assess intrastate, interstate, and international revenues of intrastate carriers in their state. The Commission does not have the authority to order otherwise.

The Commission has interpreted similar language in the Act relative to federal funding to mean that the Commission has the authority to assess interstate, intrastate, and international revenues of interstate carriers. In fact, to fund the federal school, libraries, and rural health care program, the Commission will assess

⁹ MCI Petition at i, 6.

¹⁰ 47 U.S.C. § 254(f).

intrastate, interstate, and international revenues of interstate carriers.¹¹ To find that states cannot do the same with regard to a state fund would be inconsistent.

Finally, the Commission has determined that the majority of the funding responsibility for universal service remains with the states. High-cost states will be required to fund high rural costs caused by low population density and long loop distances on a small intrastate revenue base. This dynamic severely impacts the affordability of rates for rural, high-cost customers in these states and violates three principles of the Act. First, the Act requires quality services should be available at just, reasonable, and affordable rates.¹² The rates for consumers in states that are high cost to serve and have a small funding revenue base will not be reasonable or affordable.

Second, consumers in all regions of the nation, including low-income consumers and those in rural, insular, and high-cost areas, should have access to telecommunications services that are available at rates that are reasonably comparable to rates charged for similar services in urban areas.¹³ The Act does not limit this comparability to state boundaries. Based on the Order, rates will be severely diverse between a low-cost New York City consumer and a rural high-cost Montana consumer. To further limit the funding base in Montana widens the disparity of rates.

Third, and most importantly, the Act requires that there be specific, predictable, and sufficient federal and state mechanisms to preserve and advance

¹¹ Universal Service Order, 7 Comm. Reg. at 127 ¶ 40, 336 ¶ 837, 337 ¶¶840-41.

¹² 47 U.S.C. § 254(b)(1).

universal service.¹⁴ U S WEST argues that the federal fund as envisioned in the Order is insufficient because it addresses only 25 percent of the high-cost problem. Relegating 75 percent of the high-cost funding responsibility to high-cost states leaves state funds insufficient because of the inadequate revenue funding base in most of these states. For the Commission to exacerbate the problem by mandating that states cannot expand that funding base as much as possible to include interstate and international revenues is untenable. An intrastate carrier's interstate and international services which benefit from the use of a state network should and must contribute to the support mechanisms in that state.

The Commission should and must reject MCI's proposal requesting the Commission to overstep its authority and attempt to limit a state's universal service funding base.

IV. CONCLUSION

U S WEST urges the Commission to reconsider its decision to fund only 25 percent of the high-cost support necessary to maintain affordable rates in high-cost rural areas and to instead adopt a national universal service fund for rural and high-cost support. In addition, the Commission should reject MCI's proposal that states not include carriers' interstate and international revenues in determining

¹³ 47 U.S.C. § 254(b)(3).

¹⁴ 47 U.S.C. § 254(b)(5).

assessments. These revenues should be included in assessments for high-cost support, just as they are in other areas.

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August 18, 1997

CERTIFICATE OF SERVICE

I, Sherril Schalk, do hereby certify that on this 18th day of August 1997, I have caused a copy of the foregoing **COMMENTS OF U S WEST, INC. TO PETITIONS FOR RECONSIDERATION AND/OR CLARIFICATION** to be served via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.


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***Via Hand-Delivery**

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